

1 MARK E. FERRARIO
2 Nevada Bar No. 1625
3 ferrariom@gtlaw.com
4 KARA B. HENDRICKS
5 Nevada Bar No. 7743
6 hendricksk@gtlaw.com
7 MOOREA L. KATZ
8 Nevada Bar No. 12007
9 katzmo@gtlaw.com
10 GREENBERG TRAURIG, LLP
11 3773 Howard Hughes Parkway, Suite 400 North
12 Las Vegas, Nevada 89169
13 Telephone: (702) 792-3773
14 Fax: (702) 792-9002
15 Attorneys for Defendants
16 *Clark County School District,*
17 *Filiberto Arroyo, James Ketsaa and*
18 *Christopher Klemp*

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**

13 DANIEL M. BURGESS, individually,

14 Plaintiff,

15 vs.

16 CLARK COUNTY SCHOOL DISTRICT, a
17 political subdivision; FILIBERTO ARROYO,
18 an individual; JAMES KETSAA, an
individual; CHRISTOPHER KLEMP, an
individual; DOES I through X; and ROE
CORPORATIONS I through X, inclusive,

19 Defendants.

Court Case No. 2:15-cv-01828-JCM-NJK

20 **STIPULATION AND [PROPOSED]**
21 **ORDER TO EXTEND THE DEADLINE**
22 **TO FILE AND SERVE AN ANSWER OR**
23 **OTHERWISE RESPOND TO**
24 **COMPLAINT**

25 **(First Request)**

26 IT IS HEREBY STIPULATED AND AGREED, by and between all parties hereto, through
27 their respective counsel of record, to extend the deadline until November 27, 2015 for Defendants
28 Clark County School District (“CCSD”), Filiberto Arroyo, James Ketsaa and Christopher Klemp
(collectively, “Defendants”), to file and serve an answer or otherwise respond to Plaintiff Daniel M.
Burgess’ Complaint.

26 This extension is requested to consolidate the time for all Defendants to respond to the
27 allegations in the complaint as each Defendant was served on a different date. The proposed
28

1 November 27, 2015 response date is 60 days from the date in which counsel accepted service
 2 pursuant to F.R.C.P. 4(d) for James Ketsaa, the last defendant to be served in this matter.

3 The respective service dates for Defendants are as follows:

4 a. The Complaint was served on CCSD on August 24, 2015;
 5 b. The Complaint was served on Filiberto Arroyo on August 26, 2015;
 6 c. The Complaint was served on Christopher Klemp on September 22, 2015; and
 7 d. Counsel for Defendants waived service of Defendant James Ketsaa on September 28,
 8 2015 pursuant to F.R.C.P. 4(d).

9 This is the first request for an extension of the response deadline.

10 Accordingly, the parties respectfully request the Court to order such deadline to answer or
 11 otherwise respond to Plaintiff's Complaint be extended to November 27, 2015.

12
 13 Dated: September 29, 2015.

14 GREENBERG TRAURIG, LLP

15 /s/ Kara B. Hendricks

16 Mark E. Ferrario, Esq.
 17 Kara B. Hendricks, Esq.
 18 Moorea L. Katz, Esq.
 19 3773 Howard Hughes Parkway
 Suite 400 North
 Las Vegas, Nevada 89169

20 *Attorneys for Defendants*
 21 *Clark County School District, Filiberto Arroyo,*
James Ketsaa and Christopher Klemp

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12
 13 Dated: September 29, 2015.

14 MAIER GUTIERREZ AYON

15 /s/ Jason R. Maier

16 Joseph A. Gutierrez, Esq.
 17 Jason R. Maier, Esq.
 18 400 South 7th Street
 Suite 400
 19 Las Vegas, Nevada 89101

20 *Attorneys for Plaintiff*

ORDER

Pursuant to the stipulation of the parties,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the stipulation and order to extend the deadline until November 27, 2015, for Defendants to answer or other respond to Plaintiff's Complaint, is hereby **GRANTED**.

United States Magistrate Judge

DATE/TIME: September 30, 2015

Respectfully submitted by:

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

Mark E. Ferrario, Esq.

Kara B. Hendricks, Esq.

Moorea L. Katz, Esq.

3773 Howard Hughes Pkwy

Las Vegas, Nevada 8916

Attorneys for Defendants

Clark County School District, Filiber